

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

**In re: MARK F. WHITE,
NNIKA E. WHITE,
Debtors.**

Case No. 14-36232-KRH
Chapter 13
Trustee: Hyman

NOTICE OF MOTION

The Debtors, by Counsel, have filed a Motion to Extend Time to File Schedules, Statements, and Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one, in this bankruptcy case.

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then, **on or before 14 Days from December 2, 2014,** you or your attorney must:

File a response with the Court, pursuant to Local Bankruptcy Rule 9013-(H). You must mail your response to the Clerk, United States Bankruptcy Court, 701 E Broad Street, Suite 4000, Richmond, VA 23219. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy of your response to: Nisha M. Patel, Esq. at, 9101 Midlothian Turnpike, Suite 800, Richmond, VA 23235.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that Motion.

Date: December 2, 2014

/s/ Nisha M. Patel
Nisha M. Patel, Esq. (VSB #83302)
Law Office of White & Associates
9101 Midlothian Turnpike, Suite 800
Richmond, VA 23235
(804) 377-9431

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**MOTION TO EXTEND TIME TO FILE SCHEDULES, STATEMENTS,
AND CHAPTER 13 PLAN**

COME NOW the Debtors, by Counsel, Nisha M. Patel, Esq., and move for an extension of time to file the Debtors' Schedules, Statement of Financial Affairs, and Chapter 13 Plan, and in support of this Motion, states as follows:

1. The Debtors filed their voluntary petition under Chapter 13 of the Bankruptcy Code on November 19, 2014.
2. At the time of filing, the Debtors were still in the process of gathering the income and asset verification and other documentation required for Counsel to complete and file Schedules A-J, the Statement of Financial Affairs, and the Chapter 13 Plan (the "Schedules and Plan"). Pursuant to Local Bankruptcy Rules 1007-1 and 3015-2, the Schedules and Plan are due by the end of the day on December 3, 2014. The Debtors are still gathering their documentation and Counsel is scheduled to be in Court on December 3, 2014. Out of an abundance of caution, Counsel requests an extension of time in which to meet with the Debtors and file the Debtors' Schedules and Plan.
3. Notice is hereby given that parties objecting to the extension of time shall file written objections with the Court within seven (7) business days after service of this Motion by the Debtor.

WHEREFORE, Counsel respectfully requests that this Court enters an Order extending the date by which the Debtors' Schedules and Plan must be filed with the Court.

Respectfully submitted:

MARK F. WHITE
NNIKA E. WHITE

/s/ Nisha M. Patel
Nisha M. Patel, Esq.
Counsel for Debtors

Nisha M. Patel, Esq. (VSB #83302)
Law Office of White & Associates
9101 Midlothian Turnpike, Suite 800
Richmond, VA 23235
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice and Motion were mailed electronically via CM/ECF to the Chapter 13 Trustee at station08@ricva.net and via first-class mail to all creditors on the attached service list and all necessary parties on December 2, 2014.

/s/ Nisha M. Patel
Nisha M. Patel, Esq.
Counsel for Debtors